

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

STEWART ABRAMSON, individually and
on behalf of a class of all persons and entities
similarly situated,

Plaintiff,

v.

**LINE 5, LLC; HEADSTART
WARRANTY GROUP LLC; and MLB
GLOBAL, LLC d/b/a BENCHMARK
WARRANTY,**

Defendants.

CIVIL DIVISION

Case No. 2:25-cv-00288-PLD

ELECTRONICALLY FILED

JURY TRIAL DEMANDED

STIPULATION SELECTING ADR PROCESS

Counsel report that they have met and conferred regarding Alternative Dispute Resolution (ADR) and have reached the following stipulation pursuant to L.R. 16.2 and the Court's ADR Policies and Procedures.

I. PROCESS

Select one of the following processes:

- ☒ Mediation
- ☐ Early Neutral Evaluation (ENE)
- ☐ Court sponsored Binding¹ Arbitration
- ☐ Court sponsored Non-binding Arbitration
- ☐ Other (please identify process and provider) _____

If you are utilizing a private ADR process, such as the American Arbitration Association, be advised that the case is still governed by the Court's ADR Policies and Procedures. It is the responsibility of counsel to ensure that all of the proper forms are timely submitted and filed, as required by Policies and Procedures.

II. COSTS

The parties have agreed to share the ADR costs as follows (do not complete percentages for Court sponsored arbitration. For that process, costs are paid by the Court in accordance with 28 USC §658.):

- _____ % by Plaintiff(s)
- _____ % by Defendant(s)
- _____ % by Third Party Defendant(s)

¹ For binding arbitration, please complete form "Stipulation to Binding Arbitration" located on the Court's website at www.pawd.uscourts.gov

If a dispute arises as to compensation and costs for the mediator/neutral evaluator/private arbitrator, the Court will set reasonable compensation and costs.

III. NEUTRAL

The parties hereby designate by agreement the following individual to serve as a Neutral in the above-styled action:

Name of Neutral: Hon. Kenneth J. Benson (Ret.)
 Address of Neutral: Justus ADR Services, LLC,
PO Box 101824, Pittsburgh, PA 15237
 Telephone & FAX Numbers: 412-281-9112
 Email address of Neutral: luke.myslinski@justusadr.com
Date of ADR Session: The parties have reached out to Judge Benson and have received
dates for Mediation in July, with additional dates forthcoming in August for the Mediation.

IV. PARTICIPANTS

Name and title of the individual(s) who will be attending the mediation or early neutral evaluation session, **in addition to counsel**, in accordance with **Section 2.7 (Attendance at Session)** of the Court's ADR Policies and Procedures:

Anthony Paronich
 Attorney for Plaintiff(s)

Stewart Abramson
 Plaintiff

Corporate Representative
 (Name and Title)

Britt Suttell
 Attorney for Defendant(s)

Line 5, LLC
 Defendant

Corporate Representative
 (Name and Title)

Andrew Schwartz & Barry Gauglardi
 Attorney for Defendant(s)

Headstart Warranty Group LLC
 Defendant(s)

Tim Schurr, CEO
 Corporate Representative
 (Name and Title)

If there is insufficient space to list all parties who will be attending the session, please add additional sheets as necessary.

Each party certifies that the representative(s) attending the ADR session on its behalf has full and complete settlement authority, **as specified in sub-section (A)(1-3) of the above section of the Court's ADR Policies and Procedures.**

V. ACKNOWLEDGMENT

We, the undersigned parties to this action, declare that this stipulation is both consensual and mutual.

Dated: 6/12/2025 s/ Anthony Paronich
Attorney(s) for Plaintiff(s)

Dated: 6/12/2025 s/ Britt Suttell
Attorney for Defendant Line 5 LLC

Dated: 6/12/2025 s/ Andrew M. Schwartz
Attorney for Defendant Headstart Warranty Group LLC